

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED

NOV 19 2020

U.S. CLERK'S OFFICE
EVANSVILLE, INDIANA

UNITED STATES OF AMERICA,)

Plaintiff,)

V.)

SHAQUILLE CANNON)

a/k/a Shaq,)

ZACHARY BURKHEAD,)

CASSANDRA SHEPARD)

a/k/a Cassie,)

Defendants.)

Cause No.

1:20-cr-317-JPH-TAB

-01

-02

-03

INDICTMENT

The Grand Jury charges that:

Count One

(21 U.S.C. §§ 841(a)(1) and 846—Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances)

From approximately early March 2020 through April 2020, the exact dates being unknown to the grand jury, in the Southern District of Indiana, SHAQUILLE CANNON a/k/a Shaq, ZACHARY BURKHEAD, and CASSANDRA SHEPARD a/k/a Cassie, defendants herein, did knowingly conspire together and with diverse other persons, known and unknown to the Grand Jury, to possess with intent to distribute and to distribute 50 grams or more of methamphetamine (actual) in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

Count Two

(21 U.S.C. § 841(a)(1) Distribution of Controlled Substances)

On or about March 20, 2020, in the Southern District of Indiana, ZACHARY BURKHEAD, defendant herein, knowingly and intentionally distributed 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Count Three

(21 U.S.C. § 841(a)(1) Distribution of Controlled Substances)

On or about April 17, 2020, in the Southern District of Indiana, CASSANDRA SHEPARD a/k/a Cassie, defendant herein, knowingly and intentionally distributed 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Count Four

(21 U.S.C. § 841(a)(1) Possession with Intent to Distribute Controlled Substances)

On or about October 15, 2020, in the Southern District of Indiana, SHAQUILLE CANNON a/k/a Shaq, defendant herein, knowingly and intentionally possessed with the intent to distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

FORFEITURE

1. Pursuant to Title 21, United States Code, Section 853, if convicted of any of the offenses set forth in Counts One through Four of the Indictment, the defendants shall forfeit to the United States any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the offenses, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses.

2. The United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and as incorporated by Title 28, United States Code, Section 2461(c), if any of the property described above in paragraph 1, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

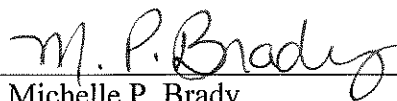
A TRUE BILL:



FOREPERSON

JOSH J. MINKLER
United States Attorney

By:


Michelle P. Brady
Assistant United States Attorney